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June 20, 2018

VIA ECF AND E-MAIL

Honorable Kimba M. Wood
Senior United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Steven Brown, 16 Cr.436 (KMW)

Dear Judge Wood:

We represent Defendant Steven Brown in the above-referenced matter and we are writing to respectfully request an adjournment of his sentencing date, which is currently scheduled for July 18th. We have consulted with the Government and they join in this request for an adjournment of sentence until a day convenient to the Court during the week of September 17, 2018. Accordingly, we request that the time for the submission of Defendant's Sentencing Memorandum likewise be extended so it is due ten days prior to the new sentencing date, consistent with the Court's sentencing schedule order.

The reasons for this application by the defense include our receipt last week of the preliminary PSR, which contains a lengthy 68-paragraph description of the Offense Conduct presented to Probation. Much of this information, in our view, requires a detailed response. Unfortunately, Mr. Brown has been unavailable due to a series of medical tests he was undergoing in California. He was diagnosed last week with open angle glaucoma in both eyes, a serious condition given his medical history of erosion of the optic nerves. These medical tests

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have hindered his ability to meet with us and have been a major impediment to our progress. We expect our view of the facts may differ materially from the Government's and, consistent with our obligations to our client and the Court, we need to make the detailed presentation in our sentencing submission to do justice to our client. This additional time should permit us to do so.

This is the first request for an adjournment of sentence.

We thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Walter Mack', with some stylized loops and flourishes.

Walter Mack

cc: (via email): AUSA Katherine Reilly
AUSA Noah Solowiejczyk
Officer Ross Kapitanksy (Probation)